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9 **UNITED STATES DISTRICT COURT FOR THE**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12

13 **Omid SAADATI**,) Case No.: C07-05091 EMC
14)
15 Petitioner,)
16)
17 v.) **Stipulation and [Proposed] Order**
18) **Continuing Case Management Conference**
19)
20 **Michael CHERTOFF**, in his official capacity,)
Secretary, United States Department of) Immigration Case
Homeland Security;)
21 **Peter KEISLER**, in his official capacity,) Agency No.: A071 759 726
Attorney General, United States Department of)
Justice;)
22 **Emilio GONZALEZ**, in his official capacity,)
Director, United States Citizenship and)
Immigration Services, United States)
Department of Homeland Security; and)
23 **Gerard HEINAUER**, in his official capacity,)
Director, Nebraska Service Center, United)
States Citizenship and Immigration Services,)
United States Department of Homeland)
Security, Lincoln, Nebraska)
24)
25)
26)
27)
28 Respondents.)

1 Petitioner Saadati, by and through his attorney of record, and Respondents, by and
2 through their attorneys of record, hereby stipulate, subject to approval of the Court, to the
3 following:
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- 5 1. Petitioner Saadati filed a petition on October 3, 2007, asking the Court to review, de
6 novo, Petitioner Saadati's naturalization application and grant his naturalization, or in the
7 alternative, order the United States Citizenship and Immigration Services to adjudicate Petitioner
8 Saadati's application for naturalization.
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- 10 2. Respondents filed an answer on December 10, 2007.
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- 12 3. The Initial Case Management Conference is currently scheduled on January 16, 2008.
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- 14 4. The parties believe Petitioner's case may possibly be administratively resolved within
the next couple of months.
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- 16 5. The parties therefore agree, subject to approval by the Court, to continue the Case
Management Conference currently set for January 16, 2008 to **March 19, 2008**.
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- 18 6. The parties further agree, subject to approval by the Court, to file a joint case
management statement seven days in advance of the case management conference, and to file the
19 necessary Alternative Dispute Resolution documents twenty-one days in advance of the case
management conference. The parties are also discussing the propriety of discovery and, if
20 necessary, will provide their initial disclosures and Rule 26(f) report seven days before the case
management conference.
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24 Respectfully submitted,
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26 Dated this 14th day of December, 2007
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28 /s/ Michael Craig Cox

Michael Craig Cox

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Attorney for Petitioner
Omid Saadati

Dated:

/s/
Ila Deiss

Assistant United States Attorney
Attorney for Respondents

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that the Case Management Conference
be continued to March 19, 2008. at 1:30 p.m. A Joint CMC statement shall be filed by March 12,
2008.

Dated: December 20, 2007

